

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

United States of America

v.

NABYUNISSA BANGOURA,

TANZILUDIN BANGURAH,

and

HADJA FRANKLIN,

*Defendants*

Case No. 1:23-MJ-79

**UNDER SEAL**

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2019 to August 2022 in the city/county of Prince William

in the Eastern District of Virginia, the defendant(s) violated:

*Code Section*

21 U.S.C. §§ 841(a)(1) and 846

*Offense Description*

Conspiracy to distribute 40 grams or more of fentanyl

This criminal complaint is based on these facts:

See Affidavit.

☐ Continued on the attached sheet.

Reviewed by AUSA/SAUSA

Phil Alito, Assistant U.S. Attorney

*Printed name and title*

*Daniel McCoy*  
*Complainant's signature*

Special Agent Daniel McCoy, FBI

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone

(specify reliable electronic means).

Date: 04/07/2023

**Lindsey Vaala** Digitally signed by Lindsey Vaala  
Date: 2023.04.07 13:30:02 -04'00'

*Judge's signature*

City and state: Alexandria, Virginia

Hon. Lindsey R. Vaala, U.S. Magistrate Judge

*Printed name and title*